

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Petition of)	
)	
MERIDIAN COMMUNICATIONS COMPANY)	
)	RM-8902
For Amendment of § 73.606(b),)	
TV Table of Allotments)	MM Docket No. _
to Delete Channel 34 from)	
Lake Havasu City, Arizona and to)	
Add Channel 34 at Laughlin, Nevada)	

To: The Chief, Allocations Branch

SUPPLEMENT TO PETITION FOR RULEMAKING

Mojave Broadcasting Company ("Mojave"), as successor to Meridian Communications Company ("Meridian"),¹ permittee of unbuilt television station KMCC, authorized to operate on Channel 34 at Lake Havasu City, Arizona (the "Station"), hereby further supplements the Petition for Rulemaking ("Petition"), filed July 9, 1996, to change the community of license of Channel 34 from Lake Havasu City, Arizona, to Laughlin, Nevada, and modify the Station's construction permit to specify Laughlin, Nevada as its city of license. Mojave, as successor permittee, further requests a change in the DTV allotment of the Station.

In its July 9, 1996, Petition, Meridian demonstrated that the proposed reallocation of Channel 34 to Laughlin, Nevada would provide that community with its first local television

¹ On July 30, 1997, the Commission approved the assignment of the construction permit for KMCC, Channel 34, Lake Havasu City, Arizona, from Meridian to its wholly-owned subsidiary, Mojave. BAPCT-970618IL.

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transmission facility and permit the new television station to serve a far larger area and population than would be possible with the currently authorized facility licensed to Lake Havasu City. Meridian further demonstrated that the optimal site for maximized coverage of the area is a Bureau of Land Management site at Oatman, Arizona (with geographic coordinates $35^{\circ} 01' 57''$ N, $114^{\circ} 21' 56''$ W), from which it was uncertain whether city grade coverage to all of Lake Havasu City could be achieved.

On November 20, 1996, Meridian supplemented its Petition to change the community of license of Channel 34 from Lake Havasu City to Laughlin, Nevada. Meridian demonstrated that deficiencies in line-of-sight coverage render the Oatman site inappropriate for a station licensed to Lake Havasu City. Meridian further demonstrated that the Oatman site is ideal, however, for coverage of Laughlin, Nevada, and for maximized service to the surrounding area, and that Laughlin is far more capable of supporting a local television station than Lake Havasu City.

It is the Petitioner's understanding that action on the rulemaking request has been delayed pending resolution of issues relating to the implementation of high definition television service. In that regard, in its Sixth Report and Order in MM Docket No. 87-268 (Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service), FCC 97-115 (rel. Apr. 21, 1997), the Commission assigned digital television ("DTV") Channel 35 as the "paired" channel for digital transmissions by KMCC, and specified the coordinates of the currently authorized site, with effective radiated power ("ERP") of 50 kW and height above average terrain ("HAAT") of 817 meters. As shown in the attached Engineering Statement, a change in the

DTV allotment for the new station to specify the Oatman transmitter site proposed in the pending petition for rulemaking can be made in full compliance with the Commission's technical requirements with respect both to existing NTSC stations and allotments and to the DTV Table of Allotments adopted in the Sixth Report and Order. Further, a DTV facility operating at maximum facilities from the Oatman site would increase coverage from 17,390 square kilometers to 34,720 square kilometers and from 76,000 to 118,000 persons. Finally, DTV operation from the new site will not cause any appreciable interference to any other station.²

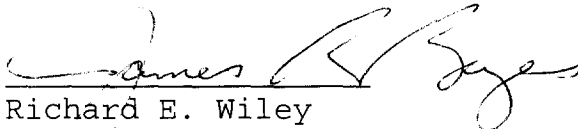
Accordingly, for the reasons set forth above as well as in its July 9, 1996, Petition for Rulemaking and its November 20, 1996, Supplement to Petition for Rulemaking, Mojave requests that the Commission change the community of license for KMCC, Channel 34, from Lake Havasu City, Arizona to Laughlin, Nevada and change the DTV allotment for the Station to specify the coordinates for the Oatman, Arizona site (35° 01' 57'' N, 114° 21' 56'' W), with ERP of 5 MW and HAAT of 1369 meters.

² As indicated in the attached Engineering Statement, predicted interference to KBLP's DTV operation on Channel 38 at Paradise, Nevada would be de minimus (1 square kilometer, 0 population). Such interference could be eliminated entirely, of course, with a reduction in power or height.

Respectfully submitted,

MOJAVE BROADCASTING COMPANY

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February 9, 1998



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**SUPPLEMENTAL ENGINEERING STATEMENT
ON BEHALF OF
MERIDIAN COMMUNICATIONS COMPANY
IN SUPPORT OF A PETITION TO AMEND
THE TV TABLE OF ALLOTMENTS**

JANUARY 8, 1998

PREPARED BY: GARRETT G. LYSIAK, P.E.

**SUPPLEMENTAL ENGINEERING STATEMENT
ON BEHALF OF MERIDIAN COMMUNICATIONS COMPANY
IN SUPPORT OF A PETITION TO AMEND THE TV TABLE OF ALLOTMENTS**

PAGE 1

This supplemental engineering statement has been prepared on behalf of Meridian Communications Company ("Meridian") in support of a petition to amend the TV Table of Allotments. An allocation study was performed to examine the effect of this proposal on both DTV and NTSC facilities using the criteria in the 6th Report and Order. This study demonstrates that a full service facility proposed by Meridian does not impact any other facilities and is fully spaced according to present FCC Rules and Regulations. The results of this allocation study are included as Figure 1.

In addition to the full service study a DTV study was completed. The site locations used for the analysis were:

KMCC present site Latitude 34° 33' 06 Longitude 114° 11' 37

Proposed Site Latitude 35° 01' 57" Longitude 114° 21' 56"

The study was performed using an output power of 5 MW with a center of radiation of 1369m above average terrain.

The results of the study showed the following:

1. The proposed signal coverage area increases from 17,390 sq. km to 34,720 sq. km
2. The proposed coverage area serves more population. The present coverage serves 76,000 people and the proposal is predicted to serve 118,000 people.
3. From the proposed site the interference to KBLP-DT (Channel 38, Paradise,NV) is predicted to be 1 sq. km with zero population within this area. This is a de minimus case.

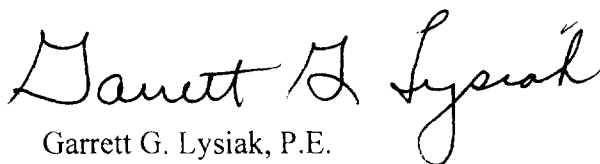
**SUPPLEMENTAL ENGINEERING STATEMENT
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PAGE 2

Conclusion

Based on the results of both the NTSC and DTV allocation and interference studies the proposal of Meridian satisfies all present rule requirements.

The DTV study showed that the proposed transmitter location move complies with all present FCC Regulations.


Garrett G. Lysiak, P.E.

Channel : 34
ZONE : 2
Project : 9000
Location: KINGMAN
State : AZ

UHF FULL SERVICE STUDY

January 5, 1998

Latitude: 35-01-57
Longitude: 114-21-56
Safety Zone: 32 km

CH	CALL	AUTH	LICENSEE		LATITUDE	ERP-kw	AZIM	DIST-km	REQ-km
ZONE	CITY of	LICENSE	ST	FCC FILE #	LONGITUDE	HAAT-m		DIFF-km	STATUS

Cochannel Analysis

34+	RM		MERIDIAN COMMUNICATIONS	34-29-02		176		61.0	280.8
II	LAKE HAVASU CITY	AZ		114-19-18				-219.8	SHORT
34+	KMCC	CP	MERIDIAN COMMUNICATIONS	34-33-06	468	164		55.6	280.8
II	LAKE HAVASU CITY	AZ	BPCT 941031KN	114-11-37	817	DA		-225.2	SHORT
34+	RM		MERIDIAN COMMUNICATIONS	35-01-57		000		0.0	280.8
II	LAUGHLIN	NV		114-21-56				-280.8	SHORT

Adjacent Channel Analysis

33+	KFBT	LIC	CHANNEL 33, INC.	35-56-44	1350	329		118.4	87.7
II	LAS VEGAS	NV	BLCT 890810KE	115-02-31	581	DA		30.7	

Intermodulation Analysis

***** No Conflicts *****

Oscillator Analysis

27Z	RM		SINCLAIR COMM. OF BOULD	35-58-42		338		113.4	100.0
II	BOULDER CITY	NV		114-50-18				13.4	CLOSE

IF Beat Analysis

***** No Conflicts *****

Sound Image Analysis

***** No Conflicts *****

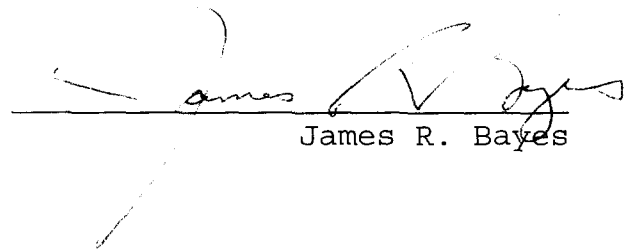
Picture Image Analysis

***** No Conflicts *****

CERTIFICATE OF SERVICE

I, James R. Bayes, hereby certify that on this 9th day of February, 1998, I caused a copy of the foregoing Supplement to Petition for Rulemaking to be delivered by hand to the following:

John A. Karousos
Federal Communications Commission
Mass Media Bureau
Chief, Allocations Branch
Policy and Rules Division
2000 M Street, NW, Room 565
Washington, DC 20554



James R. Bayes